

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

BETTY ANNE WATERS as  
Administratrix of the Estate of  
KENNETH WATERS,  
Plaintiff,

vs.

TOWN OF AYER,  
NANCY TAYLOR-HARRIS,  
ARTHUR BOISSEAU,  
BUDDY DECOT,  
WILLIAM ADAMSON,  
JOHN AND JANE DOES 1-16,

Defendants.

CIVIL ACTION  
NO. 04-10521-GAO

**PLAINTIFF BETTY ANNE WATERS'**  
**MOTION TO FILE DOCUMENTS UNDER SEAL**

Plaintiff, Betty Anne Waters ("Waters"), by her counsel, hereby moves, pursuant to L.R. 7.2 and Paragraph 5 of this Court's September 26, 2005 Protective Order, for confidential treatment of Exhibits 94 through 99 filed in connection with and support of Plaintiff's Oppositions to Defendants' Motions for Summary Judgment.

As grounds for this motion, Waters states that Exhibits 94-99 come from a confidential district attorney's file and have been designated as "Confidential" by the producing party. The aforementioned documents will be filed after this Court has ruled upon the present motion.

WHEREFORE, Waters respectfully requests confidential treatment of Exhibits 94-99 in accordance with Paragraph 5 of this Court's September 26, 2005 Order (referenced above) requiring that the documents be filed under seal and kept under seal until further Order of the Court.

Respectfully submitted,

BETTY ANNE WATERS,  
By her attorneys

/s/ Robert N. Feldman

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Dated: May 27, 2008

**CERTIFICATE OF SERVICE**

I, Robert N. Feldman, hereby certify that the foregoing document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on May 27, 2008.

/s/ Robert N. Feldman

Robert N. Feldman